

April 09, 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: lad

DEPUTY

Attachment 2 - EEOC Complaint Form

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DIVISION

Mattie Young (pro se)

(Name of plaintiff or plaintiffs)

Civil Action Number:

v.

6:21-cv-355

(Supplied

by Clerk's Office)

1. Cedar Crest Hospital & Residential
Treatment Center

2. Acadia Corporate Headquarters

(Name of defendant or defendants)

COMPLAINT

1. This action is brought by Mattie Young (Pro Se), Plaintiff, pursuant to the following selected jurisdiction:

(Please select the applicable jurisdiction)

Title VII of the Civil Rights Act of 1964 (42 USC §§ 2000e et seq.) Employment Discrimination on the basis of race, color, sex (gender, pregnancy and sexual harassment), religion or national origin.

The Age Discrimination in Employment Act (29 USC §§ 621 et seq.) (ADEA).

The Americans With Disabilities Act (42 USC §§ 12102 et seq.) (ADA).

The Equal Pay Act (29 USC § 206(d)) (EPA).

The Rehabilitation Act of 1973 (29 USC §791 et seq.) (Applicable to federal employees only).
 1. Cedar Crest Hospital & Residential Treatment Center
 2. Defendant 1 and 2. Listed Above (Defendant's name) lives at, or its business is located at Address for Defendants Listed below.
 (street address), _____ (city), _____
 (state), _____ (zip).

1. 3500 Interstate 35 Frontage Rd, Belton, TX 76513
 2. 6100 Tower Circle Suite 1000, Franklin, TN 37067²⁸

- 3a. Plaintiff sought employment from the defendant or was employed by the defendant at 3500 Interstate 35 Frontage Rd (street address), (city), Belton (state), TX, 76513 (zip).
- 3b. At all relevant times of claim of discrimination, Defendant employed _____ (#) employees. If defendant is a union, at all relevant times of claim of discrimination, Defendant had _____ (#) members.
4. Defendant discriminated against plaintiff in the manner indicated in paragraph 8 of this complaint on or about June 8th (month) 2020 (day) (year). If incidents of discrimination occurred more than one day, please indicate the beginning and ending dates of such acts: 29 May 2020 - 20 July 2020
5. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission (E.E.O.C.) charging defendant with the acts of discrimination indicated in paragraph 7 of this complaint on or about December (month) 7 (day) 2020 (year). (Not applicable to federal civil service employees).
- 6a. The E.E.O.C. issued a **Notice of Right to Sue** which was received by plaintiff on (month) January (day) 13, 2021 (year). (Not applicable to ADEA and EPA claims or federal civil service employees).

VERY IMPORTANT NOTE: **PLEASE ATTACH A COPY OF YOUR NOTICE OF RIGHT TO SUE AND THE ENVELOPE IN WHICH IT WAS RECEIVED TO THIS COMPLAINT.**

- 6b. Please indicate below if the E.E.O.C issued a **Determination** in your case:

Yes
 No

VERY IMPORTANT NOTE: **IF YOU CHECKED "YES", PLEASE ATTACH A COPY OF THE E.E.O.C.'S DETERMINATION TO THIS COMPLAINT**

7. Because of plaintiff's:

(Please select the applicable allegation(s))

- Race (If applicable, state race) _____
- Color (If applicable, state color) _____

- Sex (gender, pregnancy or sexual harassment) (If applicable, state sex and claim)
- Religion (If applicable, state religion) _____
- National Origin (If applicable, state national origin) _____
- Age (If applicable, state date of birth) _____
- Disability (If applicable, state disability) Nerve damage, Anxiety, PTSD
- Prior complaint of discrimination or opposition to acts of discrimination.
(Retaliation) (If applicable, explain events of retaliation) _____

The defendant: **(please select all that apply)**

- failed to employ plaintiff.
- terminated plaintiff's employment.
- failed to promote plaintiff.
- harassed plaintiff.
- other (specify) _____

8a. State specifically the circumstances under which defendant, its agent, or employees discriminated against plaintiff **PERSONALLY**:

VERY IMPORTANT NOTE: INCLUDE **SPECIFIC DATES, SPECIFIC EVENTS,**
AND ANY SPECIFIC COMMENTS MADE BY
DEFENDANT PERTAINING TO THE
DISCRIMINATION CLAIM ALLEGED ABOVE.

Please see 8a Answer Attached

8b. List any **witnesses** who would testify for plaintiff to support plaintiff's allegations and the substance of their testimony:

Janet Oladipo, Allison Liston, Christina Rutherford, Ryan Orr

8c. List any **documentation** that would support plaintiff's allegations and explain what the documents will prove:
- Statement Submitted (What I sent to management)
- Termination paperwork
- Ethics Point Report (This was the outcome of my request to corp-
orate)
- Texas Work Force Commission (This was my appeal for unemployment benefits)

9. The above acts or omissions set forth in paragraphs 7 and 8 are:

- still being committed by defendant.
 no longer being committed by defendant.

10. Plaintiff should attach to this complaint a copy of the charge filed with the Equal Employment Opportunity Commission. This charge is submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, plaintiff prays that the Court grant the following relief to the plaintiff:

- Defendant be directed to employ plaintiff.
 Defendant be directed to re-employ plaintiff.
 Defendant be directed to promote plaintiff.
 Defendant be directed to _____
and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

4/8/2021
Date
Mattie Young
Signature of Plaintiff

4207 Thunder Creek Dr Apt A
Address of Plaintiff

Killeen Tx 76549
City State Zip Code

Telephone Number(s)

Mattie Young – EEOC Complaint Form Continued

Question/ Answer

8a. On June 2nd, 2020, I submitted a statement to the manager of the unit where I was employed. The statement was reporting an incident that had taken place involving a nurse who I reported as abusive, as well as reporting a known situation with this nurse involving racial biases. On June 8th 2020, I physically went to speak with HR and management regarding the situation. After asking for fair treatment and an investigation. I was momentarily terminated by HR and Management. This same day (June 8th) I submitted a compliant on the corporate site under Ethics Point as well as filed for unemployment benefits citing the termination. June 10th I was emailed paperwork stating that I was terminated. On July 3rd 2020 through the Texas Workforce Commission appeals process, the HR director responded to my unemployment request stating on record that I quit after being reprimanded and followed the entire appeals process stating this claim, thus costing me additional benefits.